

## EPA Official Record

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**From:** "Hallinan, Patrick J. (ECY)" <PHAL461@ECY.WA.GOV>

**To:** Brian Nickel/R10/USEPA/US@EPA; "Koch, Richard A. (ECY)" <RKOC461@ECY.WA.GOV>

**Delivered Date:** 03/27/2012 08:56 AM PDT

**Subject:** RE: Comments on Spokane River permits

Hi Brian,

We didn't get much, if any comment, on the industrial permits regarding the seasonal average permit limits. In the fact sheet, we specified that when Permittees has collected sufficient effluent data from the installed treatment technology, we may elect to place either monthly average or daily maximum permit limits into the permits. Here's the language from IEP's fact sheet:

"At the end of the second permit term, the Department will have sufficient data to determine effluent variability from the installed treatment technology. At this time, the Department may include daily maximum, monthly average, or seasonal total loads as the final WQBELs; as determined appropriate and consistent with the seasonal average WLAs."

Pat

Pat Hallinan

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**From:** Brian Nickel [mailto:Nickel.Brian@epamail.epa.gov]  
**Sent:** Monday, March 26, 2012 10:35 AM  
**To:** Koch, Richard A. (ECY); Hallinan, Patrick J. (ECY)  
**Subject:** Comments on Spokane River permits

Richard, Pat:

I was wondering, did you receive any comments on your draft Spokane River permits, which asserted that seasonal average limits were inappropriate? I'm trying to anticipate whether I might receive similar comments on the Idaho permits.

Thanks,

Brian Nickel, E.I.T.

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